

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Numbering Audit Program)	DA 02-108
Implementation of the Local)	
Competition Provisions of the)	CC Docket No. 96-98
Telecommunications Act of 1999)	
Numbering Resource Optimization)	CC Docket No. 99-200

**Comments of the
Public Service Commission of Wisconsin**

The Public Service Commission of Wisconsin (PSCW) respectfully submits these comments to support the Numbering Audit Program proposed by the Common Carrier Bureau by *Public Notice* dated January 15, 2002. Comments are due by February 15, 2002.

The Issue

In the *Numbering Resource Optimization Second Report and Order*¹, the Federal Communications Commission (FCC) established an audit requirement to monitor compliance with the FCC's numbering rules. The Common Carrier Bureau (CCB) has proposed an audit program to be used in random audits that may be conducted to determine how numbers are administered by the telecommunications providers who need and use the scarce resource of telephone numbers in the North American Numbering Plan.

The Audit Program Proposed by the CCB is Appropriate

The PSCW concurs with the FCC findings in the *Numbering Resource Optimization Second Report and Order* that a comprehensive auditing program provides a level of confidence in the accuracy of number usage information submitted by

¹ Numbering Resource Optimization, *Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and in CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200*. Released December 29, 2000.

telecommunications providers.² The ability to manage numbering resources and to predict the exhaust of areas codes is dependent upon the quality of data that providers submit. An audit, or the possibility of an audit, encourages compliance with the FCC rules on number assignment. Also, an audit can be useful to identify inefficiencies in the way numbers are being used.

The audit program proposed by the CCB addresses both quantitative and qualitative parameters on the usage of numbering resources. Application of the program's work steps and data requests will help verify that the numbering data submitted by providers accurately reflect the inventories of numbers assigned to various categories. The program also provides a means to confirm compliance with number optimization rules and industry guidelines. The program contents appear comprehensive to address the many facets of number usage and administration.

The PSCW Supports the Adoption of the Numbering Audit Program

The PSCW respectfully suggests that the FCC adopt the Common Carrier Bureau's proposed numbering audit program for evaluating telephone number inventory and usage data and for testing compliance with the FCC's numbering rules.

Dated at Madison, Wisconsin, February 7, 2002.

By the Commission:

/s/ Lynda L. Dorr

Lynda L. Dorr
Secretary to the Commission

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² Numbering Resource Optimization, Paras. 81-88.